

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In Re:

Patrick G. Popo

Case No.: 16-31730

Judge: Michael B. Kaplan

Chapter: 13

**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION**

The debtor in this case opposes the following **(choose one)**:

1. ☒ Motion for Relief from the Automatic Stay filed by Homebridge,  
creditor,

A hearing has been scheduled for April 25, at 9:00 am.

- ☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for \_\_\_\_\_, at \_\_\_\_\_.

- ☐ Certification of Default filed by \_\_\_\_\_,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons **(choose one)**:

- ☐ Payments have been made in the amount of \$ \_\_\_\_\_, but have not  
been accounted for. Documentation in support is attached.

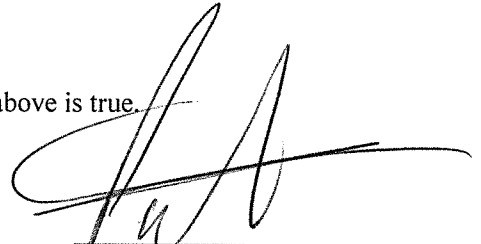
☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

☒ Other (**explain your answer**):  
See attached.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.

4. I certify under penalty of perjury that the above is true.

Date: \_\_\_\_\_

  
Debtor's Signature

Date: \_\_\_\_\_

\_\_\_\_\_  
Debtor's Signature

**NOTES:**

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.

Patrick Popo  
Case No.: 16-31730  
Attachment to Opposition to Homebridge Financial Services f/k/a  
Real Estate Mortgage Network, Inc. Motion for Relief from Stay

My construction/masonry business has been slow. Although I had bid substantial projects, the projects did not take off despite having signed profitable contracts. My business has been contracted to raise two houses, however, the Township has delayed permitting these projects since last November.

Last year I bid on project for masonry/sidewalk and steps at my local church. This \$160,000 contract is awaiting a real estate closing so the church will have the funds to complete the project.

My proposal is to make two payments to Homebridge prior to April 25, 2017, and roll the additional two payments into the Plan. I would have no objection to a thirty (30) day default clause, nor would I object to paying counsel fees of \$400.00 plus \$181.00 in Court costs through the Chapter 13 Plan.